IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

ANTONIO G. CANTU,	§	
	§	
Plaintiff,	§	
	§	CIVIL ACTION NO.
VS.	§	5:20-CV-1469
	§	
BEXAR COUNTY APPRAISAL DISTRICT	§	
AND MICHAEL AMEZQUITA, INDIVIDUAL	LLY,§	
	§	
Defendants.	§	
	_ §	

DEFENDANT'S PETITION FOR REMOVAL

Now comes the **BEXAR COUNTY APPRAISAL DISTRICT** and **MICHAEL AMEZQUITA**, INDIVIDUALLY Defendants in the above entitled and numbered cause, and pursuant to 28 U.S.C. 1441(b) files this its Petition for Removal and would respectfully show unto the Court the following:

I.

On November 18, 2020, an action was commenced against the Defendant, in Cause No. 2020CI22543 by filing of Plaintiffs' Original Petition on November 18, 2020, copies of which are attached hereto as Exhibit "A" and incorporated herein for all purposes. No other proceedings have been held in said cause.

II.

The above entitled and numbered cause is a civil action in which this Court has original jurisdiction under the provisions of 28 U.S.C. 1331, and is one which may be removed to this Court by Petitioner, **BEXAR COUNTY APPRAISAL DISTRICT** and **MICHAEL AMEZQUITA**, INDIVIDUALLY, pursuant to 42 U.S.C. § 1983.

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Defendant further submits that it will pay all court costs and debts incurred by reason of this removal proceeding should the Court determine that this action is not removable or is improperly removed. Furthermore, a written notice of the filing of the Petition has been given to all adverse parties.

IV.

There are no other Defendants in this matter and therefore the filing of a Joinder for Removal will not be necessary.

WHEREFORE, PREMISES CONSIDERED, Defendant prays that the above entitled and numbered cause now pending in the 225th Judicial District Court of Bandera County, Texas be removed to this Court.

Respectfully submitted,

LAW OFFICES OF CHARLES S. FRIGERIO A Professional Corporation Riverview Towers 111 Soledad, Suite 840 San Antonio, Texas 78205 (210) 271-7877 (210) 271-0602 Telefax Email: frigeriolaw1995@sbcglobal.net

BY: //s// Charles S. Frigerio

CHARLES S. FRIGERIO SBN: 07477500 Lead Counsel

HECTOR X. SAENZ SBN: 17514850 ATTORNEYS FOR DEFENDANTS BEXAR COUNTY APPRAISAL DISTRICT AND MICHAEL AMEZQUITA

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing Defendant **BEXAR COUNTY APPRAISAL DISTRICT** and **MICHAEL AMEZQUITA'S** Notice of Removal has been electronically filed on December 28, 2020 via CM/ECF has been forwarded by electronic mail to the ECF Participant:

Mr. Edward L. Pina Edward L. Pina & Associates, P.C. The Ariel House 8118 Datapoint Drive San Antonio, Texas 78229-3268

//s// Charles S. Frigerio

CHARLES S. FRIGERIO

Email: epina@arielhouse.com

VERIFICATION

STATE OF TEXAS	* *
COUNTY OF BEXAR	*
	undersigned authority, on this day personally appeared CHARLES S. to be a credible person, and upon his oath, stated as follows:
That he is a of Texas;	Trial Attorney and licensed to practice law in the State
APPRAIS <i>A</i> INDIVIDU	n attorney of record for Defendant, BEXAR COUNTY AL DISTRICT AND MICHAEL AMEZQUITA, [ALLY in the foregoing entitled and numbered cause, d the foregoing Defendant's Petition for Removal; and,
	nformation contained therein is within his personal and true and correct.
	CHARLES S. FRIGERIO
	AND SWORN TO BEFORE ME by the said CHARLES S 28th day of December, 2020, to certify which witness my hand and sea
	Notary Public In and For the State of Texas

My Commission Expires: